

POLSINELLI LLP
TISH R. PICKETT (SBN: 331089)
tpickett@polsinelli.com
2049 Century Park East, Suite 2900
Los Angeles, CA 90067
Telephone: (310) 556-1801
Facsimile: (310) 556-1802

MARK A. OLTHOFF (MO: 38572)
(Admitted Pro Hac Vice)
molthoff@polsinelli.com
900 W. 48th Place Suite 900
Kansas City, MO 64112
Telephone: (816) 753-1000
Facsimile: (816) 753-1536

SHUNDRA C. MANNING (TN: 036776)

(Admitted Pro Hac Vice)
scanning@polsinelli.com

501 Commerce Street, Suite 1300
Nashville, TN 37203
Telephone: (615) 259-1510
Facsimile: (615) 658-9647

Attorneys for Defendant La Clínica de La Raza, Inc.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MICHELLE ROBERTSON, as parent for minor child S.R., individually, and on behalf of all others similarly situated,

Plaintiff:

V.

LA CLINICA DE LA RAZA, INC.

Defendant

Case No. 3:23-cv-05817

**STIPULATION AND ORDER TO
CONTINUE LA CLÍNICA DE LA
RAZA, INC.' ANSWER DEADLINE**

Case Removed: November 10, 2023
Complaint Filed: September 18, 2023
Trial Date: None Set

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Local Rule 6-3,
Plaintiff Michelle Robertson, as parent for minor child S.R., individually, and on behalf of all others
similarly situated, and Defendant La Clínica de La Raza, Inc. (“La Clínica”) hereby submit the
below Stipulation and Proposed Order to continue La Clínica’s deadline to answer or otherwise
respond to the Class Action Complaint.

Currently pending before this Court are La Clínica’s Motion to Substitute the United States (Doc. 21) and non-party United States’s Motion to Remand (Doc. 12). Plaintiff and La Clínica believe it is in the best interest to extend La Clínica’s deadline to answer or otherwise respond to the Class Action Complaint until a determination is made regarding whether this Court has jurisdiction. The parties therefore agree to extend La Clínica’s deadline to answer or otherwise respond to the Class Action Complaint to twenty (20) days after a ruling on non-party United States’s Motion to Remand. Neither party will be prejudiced by the relief sought herein.

Respectfully submitted,

11 | DATED: April 8, 2024

POL SINELLI LLP

/s/* Mark Olthoff
MARK OLTHOFF

Attorney for Defendant La Clinica de La Raza, Inc.

DATED: April 8, 2024

COLE & VAN NOTE

/s/* Laura Van Note
LAURA VAN NOTE

Attorney for Representative Plaintiff

ORDER

Pursuant to stipulation, IT IS SO ORDERED. La Clínica De La Raza, Inc.'s deadline to answer or otherwise respond to the Class Action Complaint is continued to twenty (20) days after a ruling on non-party United States's Motion to Remand.

DATED: 4/9/2024

Haywood S. Gill Jr.
JUDGE HAYWOOD S. GILLIAM JR.